

Reconciled with AML/CFT/CFP Compliance

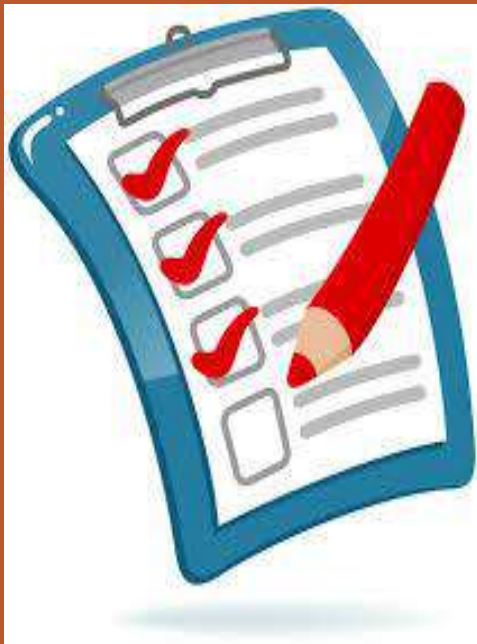
May 19 & 20 , 2021



Christine Chambers, CAMS, FCA, MSc
Financial Forensics

WEBINAR HOSTED BY THE PUBLIC ACCOUNTANCY BOARD IN COLLABORATION
WITH THE INSTITUTE OF CHARTERED ACCOUNTANTS OF JAMAICA

Day 1 Objectives



- Increased your awareness of the history of the global fight against money laundering, the financing of terrorism and proliferation financing
- Reviewed the definitions of money laundering, the financing of terrorism and proliferation financing and understood how each works
- Know the structure of Jamaica's AML/CFT/CFP legal and regulatory framework
- Be exposed to the Role of the Nominated Officer

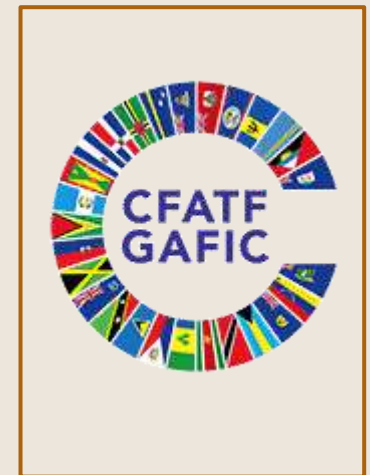
History of the Global AML/CFT/CFP Fight



EXAMPLE OF
IRELAND



FATF



CFATF

History of the Global Fight Against Money Laundering, Terrorist Financing and Proliferation Financing

- By the 1990s, the level of gang violence was a gauge for the level of activity in the drug trade.
- Gang murders went unsolved.
- Criminals fearlessly displayed their ill-gotten gains.
- 6 June 1996 – IRA gang murdered Det. Garda Jerry McCabe and seriously injured his colleague, Det. Garda Ben O’Sullivan. The savagery of the murder shocked the entire country.
- 26 June 1996 – Only 3 weeks later, John Gilligan ordered the murder of crime journalist Veronica Guerin, in order to protect his thriving drug empire.

History of the Global Fight Against Money Laundering, Terrorist Financing and Proliferation Financing

- The two murders galvanized the people of Ireland.
- Government realized it would have to strike at the root of what all criminality was about – **money**.
- They had to hit the criminals and terrorists in their pockets.
- **The murders of Jerry McCabe and Veronica Guerin led directly to a package of tough anti-crime legislation, most of which was drafted and passed into law within a month of the Guerin murder.**

Reading: “The Untouchables: Ireland’s Criminal Assets Bureau and its War on Organised Crime” *by Paul Williams*

History of the Global Fight Against Money Laundering, Terrorist Financing and Proliferation Financing

- The Financial Action Task Force (FATF) was formed in 1989.
- FATF was mandated to focus on the prevention of the use of the banking system and other financial institutions to launder the proceeds of the drug trade and other criminal activities.
- 1990 – Report of the task force was the first set of global AML standards – **The 40 Recommendations**.
- 2001 – Following the 9/11 attacks, FATF's mandate was expanded to include threats posed by the financing of terrorism. 9 Special Recommendations on terrorism added – **The 40 + 9 Recommendations**.
- Later, FATF mandate was further expanded to the prevention, suppression and disruption of the proliferation of weapons of mass destruction and its financing.

History of the Global Fight Against Money Laundering, Terrorist Financing and Proliferation Financing


- In 2012, the FATF Recommendations were revised, merging the ML and TF recommendations and adding provisions for proliferation.
- These revised FATF Recommendations became the **International Standards on Combatting Money Laundering and the Financing of Terrorism and Proliferation.**
- Today the FATF has 205 global network members all committed to implementing the FATF standards and to being assessed by their peers using the FATF methodology.

History of the Global Fight Against Money Laundering, Terrorist Financing and Proliferation Financing

- The **Caribbean Financial Action Task Force (CFATF)** is the FATF-style regional body for 25 countries in the Caribbean Basin.
- CFATF's remit is to spearhead the implementation of international AML/CFT/CFP benchmarks in the Caribbean region.
- It is responsible for the conduct of the peer review process by which member states are assessed for compliance with the FATF Recommendations.

History of the Global Fight Against Money Laundering, Terrorist Financing and Proliferation Financing

- Protecting of the international financial systems is dependent on the safe-guarding of its component parts – that is, the financial systems of the individual countries that access the international financial network.
- It is however important to note that the **international standards are not legally binding**, they are only recommendations and therefore **each jurisdiction must enact legislation** to give effect to them.



Legal and Regulatory AML/CFT/CFP Framework

Legal & Regulatory AML/CFT Framework

Jamaica's regulatory anti-money laundering and counter financing of terrorism and proliferation framework consists of:

The Proceeds of Crime Act, 2007 (POCA), the Proceeds of Crime Regulations and the Proceeds of Crime (Money Laundering Prevention) Regulations (POC-MLPR) as amended

- Represents an “all crimes” approach to dealing with the proceeds of crime
- Criminalizes money laundering
- Provides for the investigation, identification and recovery of the proceeds of crime

The Terrorism Prevention Act, 2005 (TPA) and the Terrorism Prevention (Reporting Entities) Regulations, 2010 (TP-RER) as amended

- Criminalizes actions and activities related to terrorism and terrorist financing.
- Provides measures to combat terrorism and related matters.
- It addresses foreign companies in respect of their Jamaican operations

Legal & Regulatory AML/CFT Framework

Jamaica's regulatory anti-money laundering and counter financing of terrorism and proliferation framework consists of:

The United Nations Security Council Resolutions Implementation Act, 2013 (UNSCRIA) as amended, the UNSCRI (Asset Freeze – Democratic People's Republic of Korea) Regulations, 2013 and the UNSCRI (Reporting Entities) Regulations, 2019

- Establishes domestic controls to prevent the proliferation of nuclear, chemical, or biological weapons and their means of delivery. Practical Implementation still pending.

The Financial Investigations Division Act, 2010 as amended

- Codifies the establishment of the Financial Investigations Division (FID) and provides a statutory basis for the operations and objectives of the FID

Legal & Regulatory AML/CFT Framework

Jamaica's regulatory anti-money laundering and counter financing of terrorism and proliferation framework consists of:

The Competent Authorities of the regulated sector also issue Guidance Notes to assist their registrants/licenseses to achieve AML/CFT/CFP compliance

In determining if a person has complied with the requirements of the Regulations, these Guidance Notes will be taken into account by the Court, provided that at the time concerned—

- (a) Issued by the designated authority, or a body that regulates, or is representative of, any trade, profession, business or employment concerned;
 - (b) Approved by the Minister; and
 - (c) Published in the *Gazette*
- . [POC(MLP) Reg 2(3)]

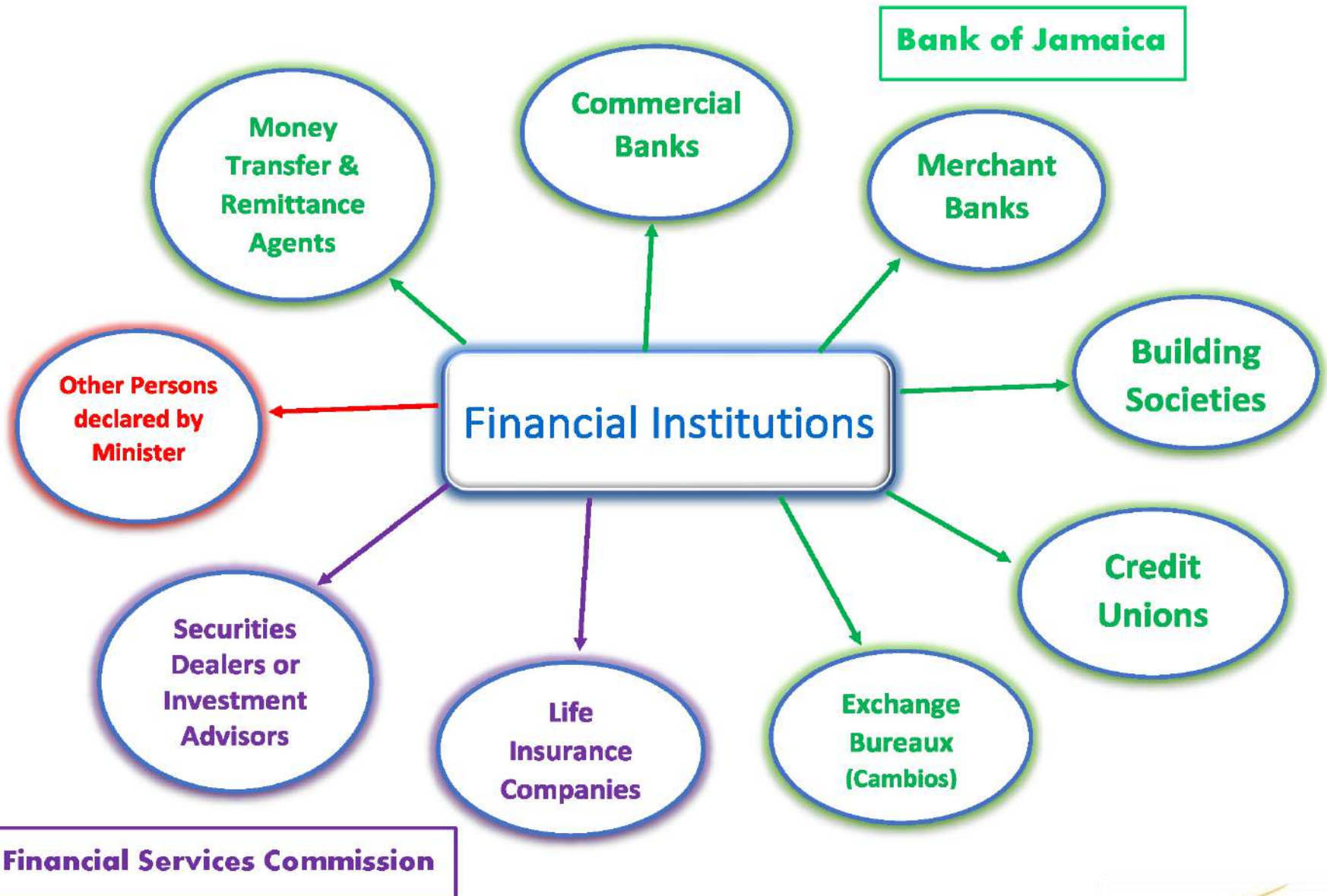
Legal & Regulatory AML/CFT Framework

The Laws use the term “regulated sector” to define the entities to which laws and guidance are applicable.

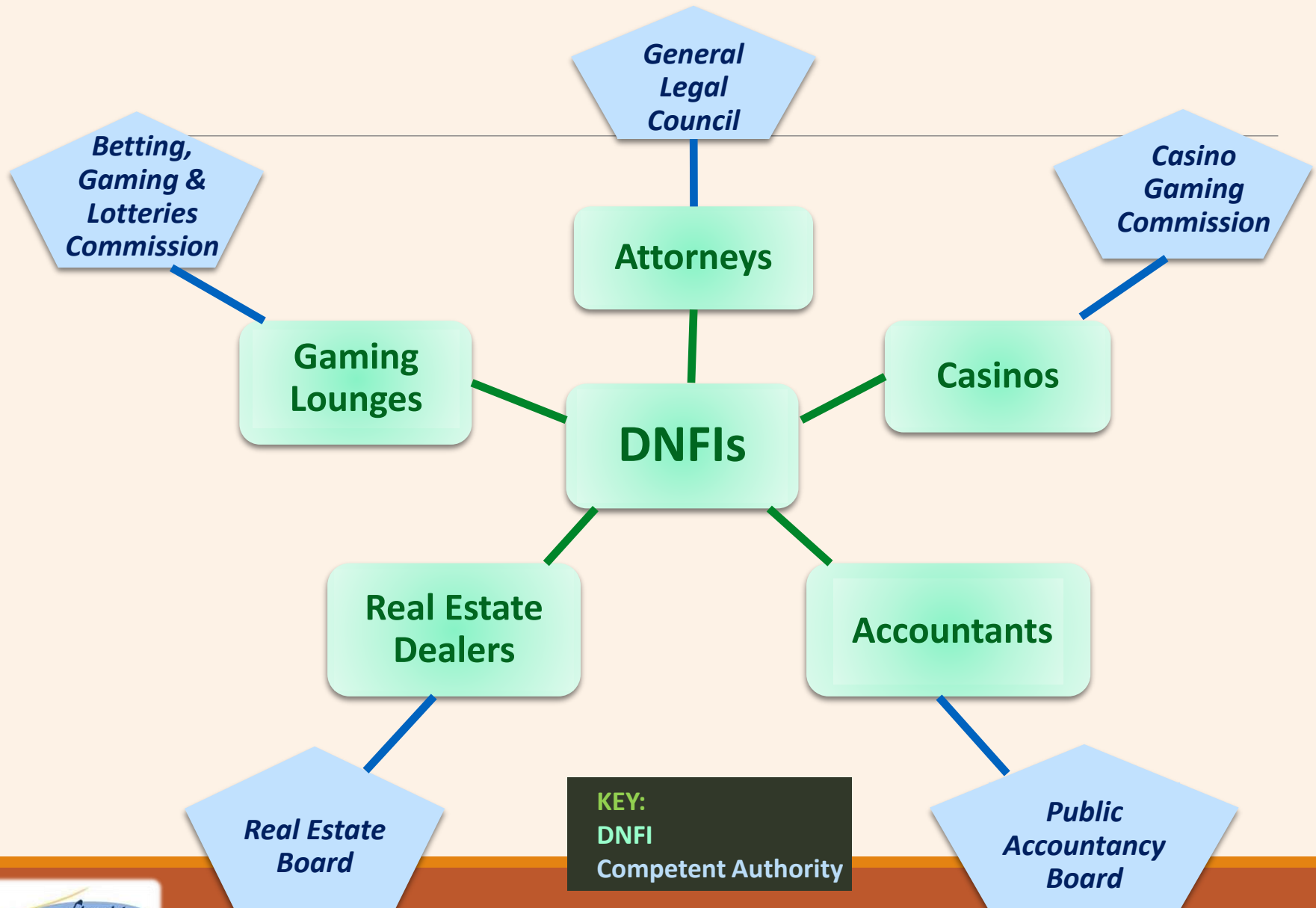
The **Regulated Sector** is comprised of -

- **Financial Institutions** and
- **Designated Non-Financial Institutions (DNFI)**

Financial Institutions



Designated Non-Financial Institutions (DNFIs)



Money Laundering

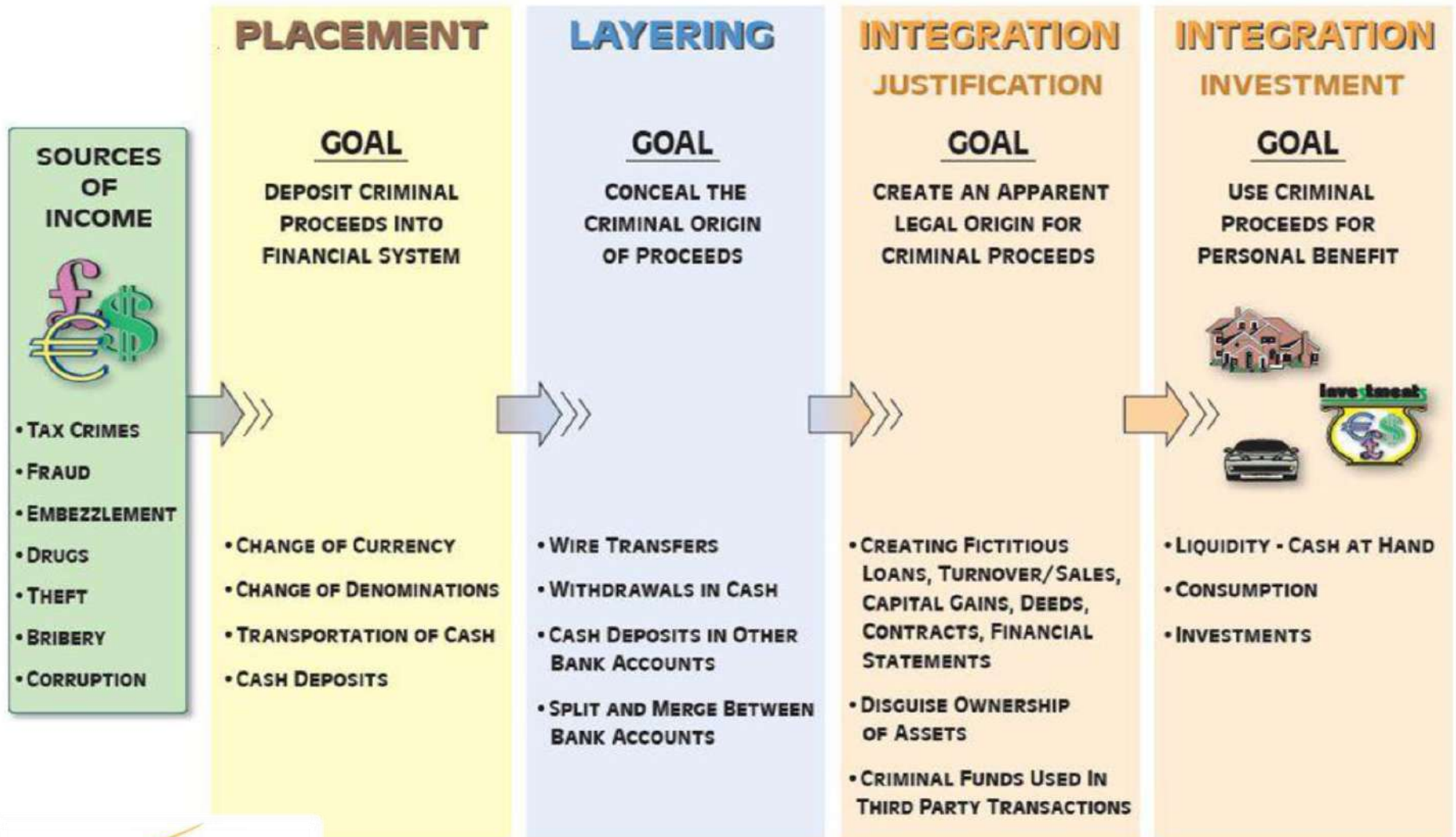


The term “money laundering” refers to all procedures, methods, and transactions designed to change the identity of illegally obtained proceeds of criminal activity so that it appears to have originated from a legitimate source.

Bloomberg QuickTake

Money Laundering

OVERVIEW OF MONEY LAUNDERING PROCESS





The Offence of Money Laundering

Money Laundering Offence

Sections 92 and 93 of POCA criminalizes money laundering.

A person commits an offence if he:

- **Section 92(1)**

- **Engages** in a transaction that involves criminal property
- **Conceals, disguises, disposes of or brings into Jamaica** any such property; or
- **Converts, transfers or removes** any such property from Jamaica

Money Laundering Offence

- **Section 93(1)**
 - **Acquires, uses or possesses** criminal property
- **Section 92(2) – Enters into an arrangement that facilitates**
 - **Acquisition, retention, use or control** of criminal property by or on behalf of another person.

and knew or believed, at the time of doing the act, that the property was criminal property

Money Laundering Offence

Actus Reus

Action with Criminal Property

- Engages in a transaction
- Conceals, disguises, disposes or brings into Jamaica
- Coverts, transfers or removes from Jamaica

Sec. 92(1)

Actus Reus

- Acquires
 - Uses
 - Possesses
- Criminal property
Sec. 93(1)

Actus Reus

Arrangement to facilitate

- Acquisition
- Retention
- Use
- Control of criminal property

Sec. 92(2)

Mens Rea

Knowledge & reasonable grounds to believe
Sec. 92(2) & Sec. 93(1)

Money Laundering Offence

❑ Criminal Property

Property is criminal property if it constitutes a person's **benefit from criminal conduct** or represents such a benefit, in whole or in part and whether directly or indirectly (and it is immaterial who carried out or benefitted from the conduct).

❑ **Criminal conduct** is anything constituting **an offence in Jamaica**, whether it happens in Jamaica or overseas.

Money Laundering Offence

Case Example

Engaging in a transaction that involves criminal property

In *DPP v Doyle*, the defendant was charged with engaging in a transaction that involves criminal property contrary to POCA Section 92 (1)(a). The prosecution alleged that the defendant opened an account with a cheque lodgement of US\$13,000.00 which represented the proceeds of the lottery scam. Information received from Western Union and JNBS analysed showed that the identified victim of the scam paid a total of US\$30,185.95 to Doyle in 2007. Doyle made deposits and withdrawals amounting to \$6,352,180.00 and \$5,244,254.11 respectively during the period April 2006 and September 2007.

Doyle pleaded guilty and was fined J\$1,000,000.00 and given a one year sentence, suspended for two years..

Money Laundering Offence

Examples

Entering into or becoming concerned in an arrangement to facilitate another person's acquisition, retention, use or control of criminal property

Example 1 – Arrangement under POCA

A lawyer who prepares the necessary documentation for a person to buy a house with criminal money.

Example 2 – Arrangement under POCA

A person who arranges for their partner or parent to register a vehicle which is criminal property in their name

Terrorism



Terrorism is any act “intended to cause death or serious bodily harm to civilians or non-combatants with the purpose of intimidating a population or compelling a government or an international organization to do or abstain from doing any act”.

Terrorism

Terrorism was assessed as a Tier 2 threat in Jamaica's National Security Policy in 2013

This rating means that the likelihood of an act of terrorism occurring in Jamaica is deemed a Low Probability, but would have High Impact, were it to occur

Financing of Terrorism

Terrorist financing refers to the act of accommodating or facilitating financial transactions that may be directly or indirectly related to terrorists, terrorist activities and/or terrorist organisations.





Terrorist Financing

The Terrorist Financing Process



- Donations
- Self funding
- Criminal activity

- To a terrorist network
- To a terrorist organization
- To a terrorist cell

- Purchase weapons or bomb-making equipment
- Payments for recruitment & training
- Finance living expenses of terrorists

Funds used to finance terrorism are considered an 'instrument of crime' (which are either illicit or legitimate funds directed towards a criminal purpose).

(AUSTRAC TF report 2014)



THE TERRORISM OFFENCE

The Terrorism Offence

Sections 4 through 8 and section 10, 11, 12 and 13 of the Terrorism Prevention Act describe the various offences as follows:

A person commits a terrorism offence by –

- **providing or making available** property or services for terrorist purposes;
- **Using, possessing or dealing in** property for terrorist purposes;
- **participating in the activities** of a terrorist group;
- **facilitating** terrorist activity;
- **instructing the commission of an offence** for a terrorist group;
- **instructing someone to carry out** a terrorist activity;
- **harbouring, concealing or hindering the apprehension** of a person involved in terrorist activities; and
- **failing to disclose information** about a terrorist offence.

Terrorism in Ja. – Far-Fetched?

Mon, May 17, 2021

Newsweek

U.S. World Business Tech & Science Culture Newsgeek Sports Health Opinion

WORLD

Jihad in Jamaica: How a Radical Cleric's Arrest Reveals a Link Between ISIS and the Caribbean

BY JACK MOORE ON 5/11/17 AT 9:00 AM EDT



A soldier in camouflage gear is walking past a wall. The wall features a large mural of reggae artist Bob Marley, with the word 'MARLEY' written vertically in large letters to his right. The mural is set against a background of colorful vertical stripes.

A soldier on patrol walks past a wall painted with the image of reggae artist Bob Marley in the Tivoli Gardens neighborhood of

Al-Faisal extradited to face terror-related charges in US

LOOP NEWS CREATED : 13 AUGUST 2020 [JAMAICA NEWS](#)



JAMAICAN MUSLIM CLERIC, SHEIKH ABDULLAH AL-FAISAL HAS BEEN EXTRADITED TO THE UNITED STATES TO FACE TERRORISM-RELATED CHARGES.

Maybe not as much as believed!

Financing of the Proliferation of Weapons of Mass Destruction

Proliferation financing is the act of **providing funds or financial services** which are **used, in whole or in part, for** the manufacture, acquisition, possession, development, export, transshipment, brokering, transport, transfer, stockpiling or use of **nuclear, chemical or biological weapons**, their means of delivery and related materials.

newsy





THE PROLIFERATION OFFENCE

The Proliferation Offence

Offences relating to United Nations sanctions are addressed in Sections 9 through 12 of the UNSCRIA as follows:

- **Section 9** allows the Minister to designate, by order subject to affirmative resolution, **a provision of any law as a UN sanction enforcement law**. A specific provision of the law can only be designated if it gives effect to a decision made by the UN Security Council under Chapter VII which does not involve the use of armed force.
- **Section 10** sets out the penalties for individuals who violate a UN sanction enforcement law
- **Section 11** gives the penalties for corporate bodies that breach UN sanction enforcement laws
- **Section 12** – makes it is an offence for someone to give information or a document which is false or misleading where UN sanction enforcement law requires the provision of certain information to the relevant authority

Proliferation Financing Process

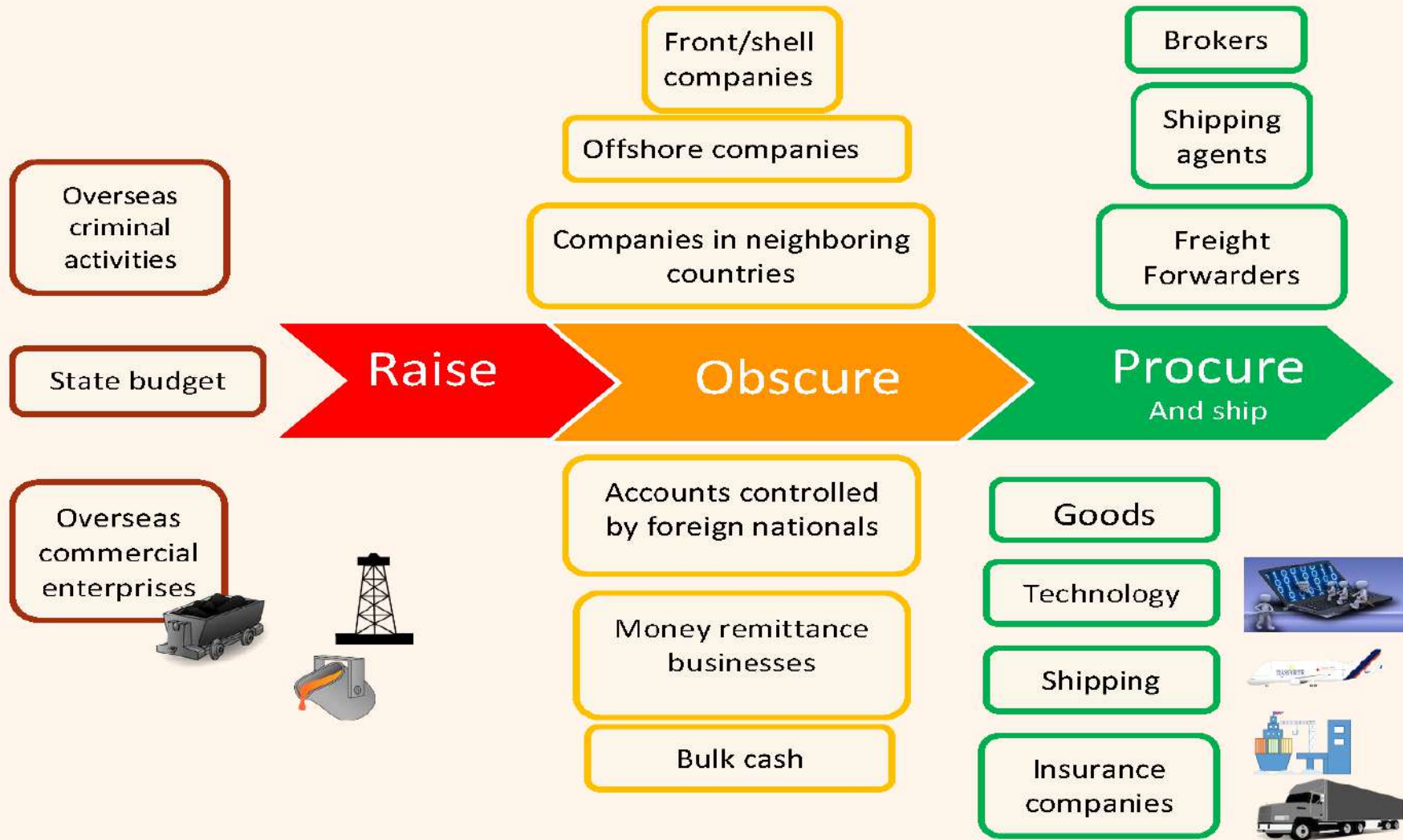
Fund raising - in the first stage, the proliferator raises funds through its domestic budget, may be supplemented with funds raised by networks overseas or by criminal activity.

Disguising the funds - in this phase, funds are transferred into the international financial system. In addition, proliferators rely on extensive networks of businesses and middlemen to obscure any connection on paper to sanctioned countries.

Procurement of materials and technology - Throughout this final phase, the international financial system will be involved in processing of transactions as the funds already in the financial systems are used to pay for goods, materials, technology and logistics needed for the WMD programme.

Note that proliferation includes the purchase of goods and parts used to develop weapons, making proliferation activities are difficult to detect.

Proliferation Financing Process





Why are Accounting Professionals included?



Why Accountants?

Ian Davidson MP, addressing the House of Commons in October 2001, described the City of London as follows:

“We should understand that there are people in British banking who are crooks. They have benefitted from crime for a considerable period. Some of us have travelled to other jurisdictions where we are told that Britain is good at telling them how they should improve their systems. However, they say the City [of London] is the dirtiest washing machine in the world in terms of the amount of money that goes through it ... I hope that [POCA’s] provisions will be applied vigorously to identify lawyers, bankers and accountants involved in concealing assets, punish them severely and send a message to others.”

From Proceeds of Crime Act: Taking the Profit Out of Crime by Dr. Shazeeda Ali (2014)

Why Accountants?

Dr. Ali comments that:

“To a great extent, this statement mirrors some of the concerns that have been expressed in Jamaica about the money laundering situation in this jurisdiction and, indeed, the aspirations for the Jamaican AML strategy.”

From Proceeds of Crime Act: Taking the Profit Out of Crime by Dr. Shazeeda Ali (2014)

Why Accountants?

The accounting profession is included because some of the services they provide make them vulnerable to potential launderers. Such services include:

- i. **Financial and tax advice** – criminals may seek financial or tax advice to place assets out of reach in order to avoid future liabilities or make assets difficult to trace
- ii. **Company and trust formation** – the formation of corporate vehicles or other complex legal arrangements, such as trusts, may be used to confuse or disguise the links between the proceeds of a crime and the perpetrator

Why Accountants?

Such services continued:

- iii. **Buying or selling of property** – the use of property transfers to cover transfers of illegal funds (layering) or the final investment of the proceeds having passed through the money laundering process (integration)
- iv. **Performing or facilitating financial transactions** – use of accountants to carry out various financial operations on their behalf (e.g. cash deposits or withdrawals on accounts, retail foreign exchange trades, purchase and sale of stocks)

Why Accountants?

Such services continued:

- v. **Introductions to financial institutions** – use of accountants as introducers or intermediaries. This can actually work in reverse as well, using financial institutions to gain introductions to accountants.



Why Accountants?

Particular vulnerabilities highlighted by FATF in their Risk Based Approach for Accounting Professionals were:

1. Formation of companies and trusts

- a) Shell companies
- b) Shelf companies

2. Management of of companies and trusts

Involvement of accountants to provide legitimacy and respectability to the company or trust

3. Acting as nominee

Nominee shareholders used to obscure criminal ownership of assets

**Public
Accountants
named
Designated
Non-Financial
Institution**

Under the Proceeds of
Crime Act on

November 15, 2013

- Effective date April 1, 2014

Under the Terrorism
Prevention Act on

June 9, 2017

- Effective date is 6 months after the date that the Order was affirmed (June 13, 2017)

No. 2590

THE PROCEEDS OF CRIME ACT

**THE PROCEEDS OF CRIME (DESIGNATED NON-FINANCIAL INSTITUTION)
(PUBLIC ACCOUNTANTS) ORDER, 2013**

In exercise of the powers conferred upon the Minister by paragraph 1(2) of the Fourth Schedule to the Proceeds of Crime Act, the following Order is hereby made:—

1. This Order may be cited as the Proceeds of Crime (Designated Non-Financial Institution) (Public Accountants) Order, 2013.
2. With effect from the 1st day of April, 2014, any person to whom paragraph 3 applies is hereby designated as a non-financial institution for the purposes of the Act.
3. This paragraph applies to any person registered as a public accountant under the Public Accountancy Act, and who carries out any of the following activities on behalf of any client—
 - (a) purchasing or selling real estate;
 - (b) managing money, securities or other assets;
 - (c) managing bank accounts or savings accounts of any kind, or securities accounts;
 - (d) organizing contributions for the creation, operation or management of companies;
 - (e) creating, operating or managing a legal person or legal arrangement (such as a trust or settlement); or
 - (f) purchasing or selling a business entity.
4. For the purposes of paragraph 3, “securities” has the meaning assigned to it under the Securities Act.

Dated this 15th day of November, 2013.

PETER BUNTING
Minister of National Security.

Proceeds of Crime (Designated Non-Financial Institution) (Public Accountants) Order, 2013

Terrorism Prevention (Designated Reporting Entity) (Public Accountants) Order, 2017

THE TERRORISM PREVENTION ACT

THE TERRORISM PREVENTION (DESIGNATED REPORTING ENTITY) (PUBLIC ACCOUNTANTS) ORDER, 2017

In exercise of the powers conferred upon the Minister by section 15(2) of the Terrorism Prevention Act, and every other power hereunto enabling, the following Order is hereby made:—

1. This Order may be cited as the Terrorism Prevention (Designated Reporting Entity) (Public Accountants) Order, 2017.

2. With effect from the commencement date of this Order, any person to whom paragraph 3 applies is hereby designated as a reporting entity for the purposes of section 15 of the Act.

3. This paragraph applies to any person registered as a public accountant under the Public Accountancy Act, and who carries out any of the following activities on behalf of any client—

- (a) purchasing or selling real estate;
- (b) managing money, securities or other assets;
- (c) managing bank accounts or savings accounts of any kind, or securities accounts;
- (d) organizing contributions for the creation, operation or management of companies;
- (e) creating, operating or managing a legal person or legal arrangement (such as a trust or settlement); or
- (f) purchasing or selling a business entity.

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PROCLAMATIONS, RULES AND REGULATIONS

[Nov. 29, 2017

4. For the purposes of—

- (a) paragraph 2, the commencement date is the day falling six months after the date on which this Order is affirmed by resolution pursuant to section 15(2) of the Act;
- (b) paragraph 3, “securities” has the meaning assigned to it under the Securities Act.

Dated this 9th day of June, 2017.

KAMINA JOHNSON SMITH
Minister of Foreign Affairs and Foreign Trade.

Designated Non-Financial Institutions

Although the legal framework includes the UNSCRIA, there has not yet been designation of DNFI's under that law. So, we note that the UNSCRIA is an integral part of the Jamaica's AML/CFT/CFP framework, but we will discuss it only in terms of preparedness for that inevitable day when we are designated.



Designated Non-Financial Institution/ Designated Reporting Entity (Public Accountants) Orders

These DNFI Orders apply to public accountants who carry out the following activities on behalf of clients:

- ❑ purchasing or selling real estate;
- ❑ managing money, securities or other assets;
- ❑ managing bank accounts or savings accounts of any kind, or securities accounts;
- ❑ organizing contributions for the creation, operation or management of companies;
- ❑ creating, operating or managing a legal person or legal arrangement (such as a trust or settlement); or
- ❑ purchasing or selling a business entity.



Regulatory Obligations of Accounting Professionals



Regulated Sector

The framers of the AML/CFT/CFP statutes did not leave it to the regulated sector to volunteer their participation in the fight against money laundering, terrorist financing and proliferation financing, they incorporated the measures to be taken by the regulated sector into the laws.



Regulatory Controls

The Proceeds of Crime Act, the Terrorism Prevention Act and the United Nations Security Council Resolution Implementation Act and their attendant Regulations all contain specific provisions that promote the effective implementation of legal, regulatory and operational measures for combating money laundering and the financing of terrorism and proliferation.

Regulatory Controls

The essential elements of a robust AML/CFT/CFP programme mandated in the legislation, and applicable to all registrants of the Public Accountancy Board who offer the services specified in the designation order, include:



Regulatory Controls

Establish & implement programmes, policies, procedures & controls to detect, prevent & deter money laundering, terrorist financing and proliferation financing (including controls for group companies)

**POC MLP Reg. 5 (1) & (2)
TPA Sec. 18 (1) & (2)
UNSCRIA Sec. 21(2)**

Designate a Nominated Officer to be responsible for policy implementation & filing of reports

**POC MLP Reg 5(3)
TPA Sec. 18 (3)
UNSCRIA Reg. 4**

Report: Suspicious Transactions, Listed Entity Relationships or Transactions and Authorized Disclosures

**POC MLP Reg. 5 (3)
TPA Sec. 18 (3)
UNSCRIA Reg. 5(2) & 5(3)**

Establish: Risk Profile on its Operations, Risk Profiles for Business Relationships and On-going Due Diligence

**POC (MLP) Reg. 7A
& TP (RE) Reg. 6A**

Regulatory Controls – The Nominated Officer

Reg. 5(3) of POC-MLPR, Sec 18(3) of TPA and Regulation 4 of the UNSCRIA all require regulated entities to appoint **an employee with management functions** to be responsible for the execution of the compliance programme



Regulatory Controls – The Nominated Officer

The employee selected should be formally appointed by the Board of Directors or equivalent body, whatever form is used within the organization.

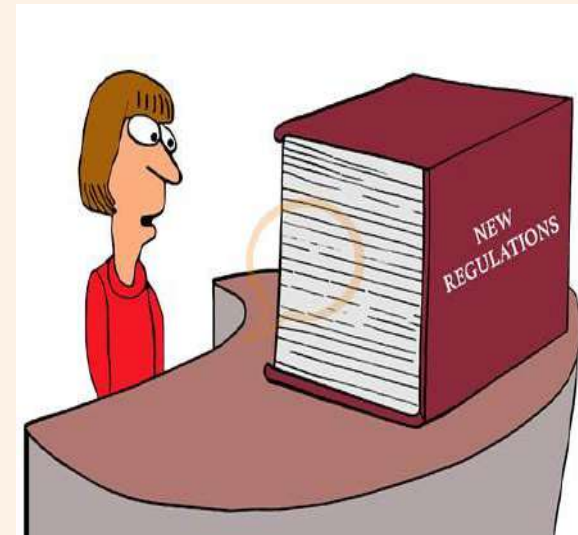
The appointment should be minuted in the official minutes of the meeting at which the appointment or ratification of the appointment takes place.



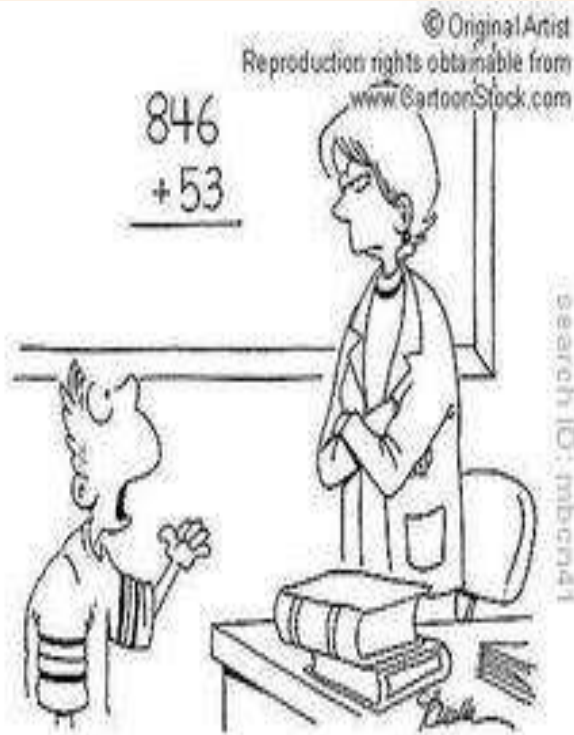
Regulatory Controls – The Nominated Officer

AML/CTF compliance officers play a critical role in ensuring an organisation understands and implements its AML/CFT obligations.

It is fundamentally important that the compliance officer understands the legal framework and statutory obligations of the regulated sector, because the implementation of these requirements is their job.



Regulatory Controls – The Nominated Officer



"Do you want the correct answer or the politically correct answer?"

This officer should possess the necessary skills, qualification and expertise to effectively perform the assigned tasks; and most importantly, he/she should **have access to all operational areas** and have the requisite **seniority and authority to report independently to the board.**

Role of the Nominated Officer

The Nominated Officer is responsible for, among other things:

- **the design, implementation and update of the AML/CFT/CFP compliance programme;**
- the day-to-day monitoring of the regulated entity's compliance with AML/CFT/CFP laws, regulations and industry best practices;
- **developing an AML/CFT/CFP training programme and coordinating its execution;**
- risk assessment and risk management;
- **reporting to the Designated Authority (External Reports) and to the Board of Directors/Owners on AML/CFT/CFP Compliance (Internal Reports); and**
- Liaising with the designated and competent authorities and law enforcement, as necessary

Role of the Nominated Officer

Establishing and maintaining requisite controls, policies and procedures in accordance with legal and regulatory framework

Awareness of AML/CFT laws, framework, global practices and trends

Prepare and update policies and procedures and disseminate information to the management and staff

Role of the Nominated Officer

Undertaking ongoing monitoring of the fulfillment of AML/CFT duties

Sample testing of compliance, reviewing exception reports

Being the point of contact for all AML/CFT issues for internal and external authorities

Oversee the implementation of the compliance programme

Ensure document retention policy is fully adhered to

Role of the Nominated Officer

Develop training material and coordinate AML/CFT training

Conduct AML/CFT training with new members of staff prior to the commencement of duties

Periodically conduct refresher training with different categories of staff to ensure they are updated on new developments

Ensure proper records of training are kept and that they are retained in accordance with the law

Role of the Nominated Officer

Risk Assessment and Risk Management

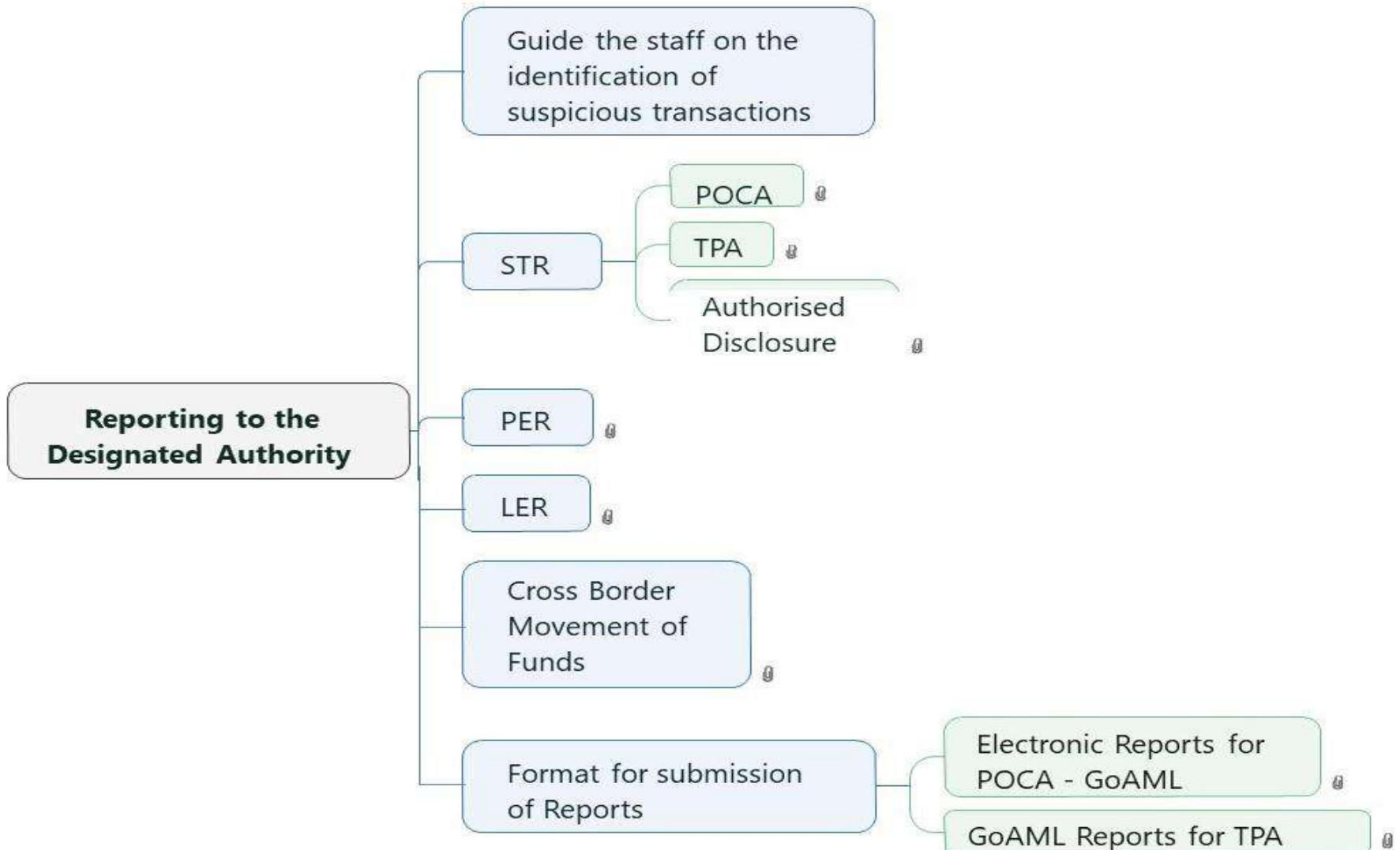
Prepare a risk profile for its operations generally having regard to services offered, distribution channels, local and international environment and the size and nature of its operations

Ensure risk assessments are done by the company to establish appropriate risk profiles and measures commensurate to risks are implemented

Evaluate new products and services to determine the level of risk they pose

Analyse the customer and transaction data, particularly those reported, to inform the update of risk profiles

Role of the Nominated Officer



Questions





Presenter:



***Christine A. Chambers, CAMS, FCA, M.Sc.
AML/CFT Specialist & Forensics Consultant
Telephone: +1 876 381-4082
Email: finforensics@gmail.com***